



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

REPLY TO
ATTN OF: S0-125

Ruth Nelson
General Counsel
United Marine Shipbuilding, Inc.
1441 N. Northlake Way
Seattle, WA 98103

Re: U.S. and WDOE v. Marine Power and Equipment, No. C85-382R

Dear Ms. Nelson,

I have enclosed for your use an outline of deficiencies that we have noted in the report submitted in partial satisfaction of the terms of the Consent Decree. We look forward to discussing these points with you at the meeting which you and I have previously scheduled for Thursday, October 13, 1988.

Sincerely,

A handwritten signature in cursive script that reads "Matthew Coco".

Matthew Coco
Assistant Regional Counsel
(206) 442-1446



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

REPLY TO
ATTN OF:

October 11, 1988

Re: Deficiencies Noted in the Sediment Disposal Plan Submitted by Marine Power and Equipment as Required by the Consent Decree

The U.S. Environmental Protection Agency and the Washington Department of Ecology note the following deficiencies in the Sediment Disposal Plan submitted by Marine Power and Equipment on June 1, 1988 as required by the Consent Decree:

The Plan was not sufficiently comprehensive to allow a reasoned decision on the best solution to the sediment contamination problem at the Lake Union site.

It did not present the basic information regarding the sediment contamination needed to thoroughly evaluate the options that should be evaluated.

It did not address a broad range of options for cleanup

It did not discuss the advantages and disadvantages of each option

The outline below lists several options that should be evaluated, the analysis necessary for each option, and the basic information needed to make a decision.

1. Characterize the sediment contamination

- a. Physical extent--area covered by an inch or more of sandblasting grit and a chart mapping the thickness of the grit.
- b. More complete chemical characterization

2. Identify options (the following are suggested options, but this list is not meant to exclude other viable alternatives)

- a. No action
- b. Cap in place
- c. Upland disposal
 - 1) Coal Creek
 - 2) Cedar Hills
 - 3) Cathcart
 - 4) Other?

- d. Water disposal
 - 1) In place ("turn-over")
 - 2) Contained nearshore fill
 - 3) Confined Puget Sound site (including interim measures, i.e., capping)
 - 4) Ocean disposal
 - a. Willapa
 - b. Columbia River
 - c. Other?
 - e. Hazardous Waste disposal sites
- 3. Evaluate environmental impacts of each alternative.
 - a. Evaluate chemical constituents
 - b. Evaluate biological effects
 - c. Will an EIS be needed?
 - 4. Evaluate engineering requirements of each alternative
 - a. Alternative removal methods? Silt screens?
 - b. For upland disposal
 - 1) Dewatering? Disposal/treatment of liquid fraction?
 - 2) Other treatment needs?
 - c. Include all permitting requirements
 - 5. Estimate costs of each alternative
 - a. Permitting costs
 - b. Operations costs